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Comments on the Draft Remedial Project Manager (RPM) Primer

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Per your request we have reviewed the draft RPM Primer, and in conjunction with CERCLA Enforcement offer the following comments and observations.

GENERAL COMMENTS

- 1) The primer is well written, interesting to read and would no doubt be useful in orientating new personnel. However, all of our reviewers felt that complex tasks were oversimplified and in general timeframes too optimistic. They suggested the use of footnotes for tasks that are known to be problems areas and affect project schedules and commitments. They also recommended footnoting for activities that have regional variations on procedures and requirements.
- 2) There is not enough information on the enforcement aspect of "Acute Waste"; nor is there any reference to an Enforcement RPM. Responsibilities of the Enforcement RPM, Program RPM and assigned attorney should all be described.
- 3) There does not seem to be a strong emphasis on overseeing RI field work. Field work, especially for a new RPM is important not just for oversight; but to acquaint the RPM with the logistics, problems, and levels of effort needed to perform the various tasks in the RI Workplan. An experienced RPM or "Mentor" should accompany the new RPM on the first couple of field trips.
- 4) The new RPM should rely on the Unit Chief, or immediate supervisor as well as "Mentor" for project scope and direction.
- 5) It would be helpful and realistic to portray the RPM managing the project, while still attending mandatory training, seminars and keeping up to date with guidance and other job responsibilities.

SPECIFIC COMMENTS

- p.1 A Removal Action that constructs overflow berms around waste ponds is not a good technical example.
- p.3 Under Purpose, the document should stress managing site activities instead of oversight.
- p.4 Last paragraph, "strength of authority" reference should be deleted. A statement regarding RPH accountability for State lead projects would be appropriate.
- p.6 First paragraph, a project management variable should also be Agency administration and policy.
- p.6 Reviewers felt that under Project Planning there should be a discussion of the SCAP and the RPH's contribution to it.
- p.7 Third paragraph, stress RPH has the authority to approve final budget, tasks and deliverables.
- p.8 Project review meetings should be held at least once a month to monitor and direct project progress.
- p.11 "The plan incorporates activities, schedules...." Cost should also be added to the sentence.
- p.11 Clarify how the RPH proceeds from project objectives to proposed responses (i.e. what alternatives are available for the different exposure pathways).
- p.11 It is unclear why an Expedited Remedial Action (ERA) is planned for the site. A statement or explanation of why the preliminary data justifies such an action should be provided (i.e. threat to public health and environment).
- p.12 Definition of Operable Unit 2 is too vague. It should be activities and not characterization.
- p.16 The state should be involved in the project long before the kick-off meeting.
- p.22 An RI/FS is not a second Operable Unit.
- p.23 Our Contract Lab Management Section does not release unvalidated data. This needs to be clarified.

- p.24 Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) were left out of the review.
- p.25 Upgradient or background wells must be included in the monitoring well program for the site.
- p.25 Recent guidance discourages discharge from Superfund sites to local POTWs
- p.26 In using a Mobile Laboratory, a greater effort for QAPP preparation is necessary.
- p.26 Generally, when there is site activity for the first time the community will need to be informed. A public meeting to explain the project and get acquainted with the community is recommended. At the very least a press release should be issued.
- p.28 Clarify that for Phase II RI work to begin a new work plan, updated QAPP and HASP as well as a new funding request must be completed.
- p.35 The importance of the ROD needs to be stressed because it is a major project milestone and forms the basis for future administrative and legal activities.
- p.35 The draft ROD should receive the same circulation for comment as the draft FS.
- p.36 In some cases, the RER contractors will be preparing the Remedial Design (RD) with the CORPs providing technical assistance.
- p.36 The RPE should not be portrayed as having a passive role in RD. The EPA is ultimately responsible for acceptance/approval of the project which mandates an active RD role.
- p.38 Operation and maintenance costs for ground water/surface water treatment remedies are part of the Remedial Action for 10 years.

List of Acronyms add:

ERCS	Emergency Response Contracting Services
EIS	Environmental Impact Statement
OSC	On Scene Coordinator
PR	Procurement Request
POTW	Public Owned Treatment Works

Change: NEIC to National Enforcement Investigations Center.

bcc: Dave Favero, CES